Page 1 of 1 PAGE

TAUBMAN KIMELMAN & SOROKA, LLP

COUNSELLORS AT LAW

30 VESEY STREET, 6TH FLOOR NEW YORK, NEW YORK 10007

(212) 227-8140

TELECOPIER (2(2) 385-0662

Website: TKSLewyers.com

OF COUNSEL JULIUS GANTMAN ANNETTE Z. KOLMAN CHARLES LAVINE ANTHONY G. GROSS

BY FAX: 212 805-6111

PHILIP E TAUBMAN

GLENN A, KIMELMAN-

MARK STEVEN SOROKA

ANTONETTE M. MILCETIC

*ALSO ADMITTED IN NU AND FL

March 21, 2008 USDC SDNY Honorable Henry Pitman DOCUMENT United States Magistrate Judge

ELECTRONICALLY FILED

Southern District of New York DOC #: 500 Pearl Street DATE FILED: 3

New York, New York 10007

HENRY PITMAN

Re: Moore c City of New York 07 CV 4805 (BSJ) (HBP)

UNITED STATES MAGISTRATE JUDGE 3-25

Dear Judge Pitman:

This letter shall serve as a joint request by the attorney for the plaintiff and the attorney for the defendant to extend all dates on the scheduling order for an additional 60 days from April 7, 2008. This is the first request for an extension of time.

This is a case dealing with an overtime claim, the parties have exchanged hundreds of pages of written discovery relating to this matter. The depositions of the parties have been scheduled and we believe that further depositions may be required as well as exchanging supplemental written documents and requests for additional documents. Counsel continues to maintain a good working relationship with each other and we are endeavoring to complete discovery as soon as possible. We have also agreed to sit down with each other after the depositions to narrow the issues and determine whether a settlement of this case can be reached. This request will allow us to complete the discovery while maintaining our obligations to other cases that we are handling.

Thank you for your consideration.

Respectfully submitted,

TAUBMAN KIMELMAN & SOROKA LLP

Philip E. Vaubman, Esq.

Attorney for the Plaintiff

THE CITY OF NEW YORK

LAW DEPARTMENT

Robert J. Anderson

Assistant Corporation Counsel